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Attorneys for Nominal Defendant
 SILICON STORAGE TECHNOLOGY, INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

In re SILICON STORAGE TECHNOLOGY,
 INC., DERIVATIVE LITIGATION

Master File No. C06-04310 JF

**STIPULATION AND [PROPOSED] ORDER
 TO EXTEND TIME TO FILE RESPONSIVE
 PLEADINGS**

Trial Date: None

This Document Relates To:

ALL ACTIONS.

WHEREAS, On May 9, 2008, Lead Plaintiffs filed their Second Amended Complaint;

WHEREAS, Lead Plaintiffs, nominal defendant Silicon Storage Technology, Inc. ("SST") the individual defendants, and the parties in the related state action, *Alex Chuzhoy v. Bing Yeh, et al.*, Santa Clara Case No. 106CV074026, (the "Parties") all met in Palo Alto, California on May 20, 2008 to participate in an all day settlement meeting in order for the Company to share information with plaintiffs relating to the audit committee chair's investigation and findings and the filing of the Company's restatement and to discuss the settlement of the derivative litigation;

WHEREAS, the Parties and representatives of SST's insurance carriers participated in an all day mediation with the Hon. William Cahill on July 31, 2008;

WHEREAS, the Parties and representatives of SST's insurance carriers are currently engaging in further settlement discussions with the assistance of the Hon. William Cahill;

WHEREAS, the Parties want to focus their efforts on settlement and avoid unnecessary litigation expenses and preserve judicial resources; and

1 **WHEREAS**, the schedule set forth below is not proposed for the purpose of delay,
2 promotes judicial efficiency, and will not cause prejudice to any party.

3 **NOW, THEREFORE**, the parties hereby stipulate, subject to the Court's approval, as
4 follows:

- 5 1. No party will file any motions before October 3, 2008;
- 6 2. Defendants shall file and serve answers or otherwise respond to the Amended
7 Complaint by October 3, 2008. In the event that Defendants file and serve any motion directed at
8 the Amended Complaint, Lead Plaintiffs shall file and serve an opposition by November 19,
9 2008. If Defendants file and serve a reply to Lead Plaintiffs' opposition, they will do so by
10 December 19, 2008.

11 3. By executing this Stipulation, the parties have not waived and expressly retain all
12 claims, defenses and arguments whether procedural, substantive or otherwise. This stipulation is
13 without prejudice to any subsequent motion to stay this action, or any objections or defenses
14 thereto, and this Order is entered without prejudice to the rights of any party to apply for a
15 modification of this Order for good cause.

16 Dated: August 18, 2008

COOLEY GODWARD KRONISH LLP

17 By _____ /s/
18 Grant P. Fondo

19 Attorneys for Nominal Defendant
20 SILICON STORAGE TECHNOLOGY, INC

21 Dated: August 18, 2008

SCHIFFRIN BARROWAY TOPAZ & KESSLER, LLP

22 By _____ /s/
23 Nichole Browning

24 Co-Lead Counsel for Lead Plaintiffs

1 Dated: August 18, 2008

WOLF HALDENSTEIN ADLER FREEMAN & HERZ
LLP

2
3
4 By _____/s/
Betsy C. Manifold

5 Co-Lead Counsel for Lead Plaintiffs

6 Dated: August 18, 2008

MCDERMOTT, WILL & EMERY LLP

7
8 By _____/s/
9 Matthew J. Jacobs

10 Attorneys for Director Defendants
11 TSUYOSHI TAIRA, YASUSHI CHIKAGAMI,
RONALD CHWANG, TERRY NICKERSON, BING
12 YEH AND YAW WEN HU

13 Dated: August 18, 2008

HELLER EHRMAN LLP

14 By _____/s/
15 Howard S. Caro

16 Attorneys for Officer Defendants
17 DEREK BEST, MICHAEL BRINER, JEFFREY
GARON, PAUL LUI, ISAO NOJIMA, and CHEN
18 TSAI

FILER'S ATTESTATION

I, Grant P. Fondo, am the ECF User whose ID and password are being used to file this Stipulation and [Proposed] Order to Extend Time to File Responsive Pleading. In compliance with General Order 45.X.B., I hereby attest that all parties have concurred in this filing.

DATED: August 18, 2008

COOLEY GODWARD KRONISH LLP

By: /s/
Grant P. Fondo

ORDER

PURSUANT TO STIPULATION AND FOR GOOD CAUSE SHOWN HEREIN, IT IS
SO ORDERED.

DATED: 8/22/08



Judge of the U.S. District Court
Jeremy Fogel

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